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Subject: Comment--Calfed Draft Programmatic EIS/EIR

It is stated in Cequa that an EIR must include a detailed statement setting forth "The growth-inducing impact of the proposed project" (see Attachment 1). I do not find in the 1200 page Calfed EIS/EIR such a statement.

On page 7.4-12 are two paragraphs which explain away growth-inducing impacts by the use of qualifying language such as: "*could* affect urban land use," "*would* depend on where population growth occurred," and "mitigation measures *could* be implemented." This is unacceptable. See Attachment 2.

On page 3-3 it is stated that "growth inducing impacts will be analyzed in greater detail in future project specific Nepa/Cequa documents." (See Attachment 3.)

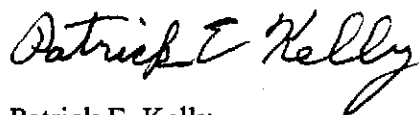
Page 7.4-1, 3rd paragraph, states "mitigation strategies have been developed which, when implemented are expected to reduce all potentially significant adverse impacts on urban land uses to less-than-significant levels." (See Attachment 4.) What are these mitigation strategies?

Page 7.4-7, under No Action Alternative, it is stated that "urban development trends in California would continue as population levels are projected to increase." (See Attachment 5.)

The above does not necessarily follow. Counties and municipalities can legally restrict growth to the available water supply. Marin is such a county. In 1998 it had a population of 245,900. It is projected that by 2020 the population will fall to 239,600.

I will conclude by saying that growth and development are our most serious environmental problems. This EIS/EIR does not give it the consideration required by Cequa.

Respectfully submitted,



Patrick E. Kelly

CHAPTER 3. STATE AGENCIES, BOARDS, AND COMMISSIONS

Environmental Impact
Reports for State
Projects

21100.

All state agencies, board, and commissions shall prepare, or cause to be prepared by contract, and certify the completion of an environmental impact report on any project they propose to carry out or approve which may have a significant effect on the environment. Such a report shall include a detailed statement setting forth the following:

Contents of Environ-
mental Impact Reports

- (a) The significant environmental effects of the proposed project.
- (b) Any significant environmental effects which cannot be avoided if the project is implemented.
- (c) Mitigation measures proposed to minimize the significant environmental effects including, but not limited to, measures to reduce wasteful, inefficient, and unnecessary consumption of energy.
- (d) Alternatives to the proposed project.
- (e) The relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity.
- (f) Any significant irreversible environmental changes which would be involved in the proposed project should it be implemented.
- (g) The growth-inducing impact of the proposed project.

The report shall also contain a statement briefly indicating the reasons for determining that various effects of a project are not significant and consequently have not been discussed in detail in the environmental impact report.

For purposes of this section, any significant effect on the environment shall be limited to substantial, or potentially substantial, adverse changes in physical conditions which exist within the area as defined in Section 21060.5.

(Amended: Chapter 264, Statutes of 1981)

Information Not
Required in Certain
Environmental
Impact Reports

21100.1.

The information described in subdivisions (e) and (f) of Section 21100 shall be required only in environmental impact reports prepared in connection with the following:

- (a) The adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency.
 - (b) The adoption by local agency formation commission of a resolution making determinations.
 - (c) A project which will be subject to the requirement for preparing an environmental impact statement pursuant to the requirements of the National Environmental Policy Act of 1969.
- (Added: Chapter 1312, Statutes of 1976)

permanent storage or conveyance facilities. Actions under the Preferred Program Alternative could be coordinated with present and proposed projects, thereby reducing the extent of the cumulative impacts. Mitigation strategies have been identified that may reduce the impacts associated with Program actions and the projects identified in Attachment A. Nevertheless, cumulative impacts on urban land uses are considered potentially significant.

Growth-Inducing Impacts. If improvements in water supply are caused by the Preferred Program Alternative, the Preferred Program Alternative could induce growth, depending on how the additional water supply was used. If the additional water was used to expand urban housing development, the proposed action would foster economic and population growth. Expansion of population could affect urban land use, but the significance of the impact would depend on where the population growth occurred and how it was managed.

Short- and Long-Term Relationships. The short-term construction-related impacts of the Preferred Program Alternative on urban land uses that are associated with construction staging areas would be minor and would cease after construction was complete. Long-term indirect effects from improved water quality and availability could include the displacement of current land uses to new urban land as the result of continued population growth. Expansion of population could affect urban land use, but the significance of the impact would depend on where the population growth occurred and how it was managed. Where possible, avoidance and mitigation measures could be implemented as a standard course of action to lessen impacts on urban land use resources.

Long-term indirect effects from improved water quality and availability could include the displacement of current land uses to new urban land as the result of continued population growth.

Irreversible and Irretrievable Commitments. Irreversible commitments of urban land use resources could result from implementing the Ecosystem Restoration Program and the Storage and Conveyance elements. Projects under these programs could convert lands currently in urban land uses to other uses, such as storage or conveyance facilities; however, the amount of acreage involved would result in a less-than-significant impact. The building of such facilities could result in an irreversible or irretrievable commitment of such resources as construction material; labor, and energy resources. If improved water quality and supply result in continued urban growth, an irreversible commitment of other land use categories to urban land uses would result.

7.4.11 MITIGATION STRATEGIES

These mitigation strategies will be considered during specific project planning and development. Specific mitigation measures will be adopted, consistent with the Program goals and objectives and the purposes of site-specific projects. Not all mitigation strategies will be applicable to all projects because site-specific projects will vary in purpose, location, and timing.

The following strategies could be implemented to mitigate potentially significant adverse impacts on urban land use.



Chapter 3. Summary Comparison of Environmental Consequences

Table 3-4. Summary of Economic and Social Effects
of the Preferred Program Alternative

Agricultural economics	Generally enhances or maintains agricultural revenues but may reduce agricultural income in local areas, especially in the Delta Region, due to conversion of agricultural lands to other uses.
Agricultural social issues	Generally benefits the agricultural community but may cause localized adverse social effects.
Urban water supply economics	May lower regulatory and water treatment costs and increase water supply, but may add costs through payment for Program elements. Many economic effects cannot be determined until more specific information is available.
Regional economics	Generally benefits regional economies but may cause adverse effects in the Delta Region. The amount and allocation of costs and benefits are currently uncertain.
Environmental justice	Beneficial or adverse effects to minority or low-income populations are possible. Project-specific evaluation is required to determine effects.
Indian trust assets	Adverse effects are not anticipated, but effects cannot be determined at the programmatic level of analysis. Project-specific evaluation is required to determine effects.

Qualitative methods and professional judgment were used in the evaluation of economic and social effects summarized in Table 3-4. These effects are presented in greater detail in Sections 7.2, 7.3, 7.5, 7.10, 7.14, and 7.15. Quantitative information for determining costs and economic benefits is not available. This information will be developed in future planning studies and project-specific analysis.

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3.2 SUMMARY OF GROWTH-INDUCING IMPACTS

Potential growth-inducing impacts are summarized in Table 3-5 (at the end of the chapter). Growth-inducing impacts are the ways in which the Program could foster (directly or indirectly) economic or population growth, or the construction of additional housing in the surrounding environment—with subsequent impacts on a variety of resources.

For this document, it was assumed that any increased water supplies or improved water supply reliability associated with the Program would stimulate growth and remove barriers to growth in the water service area. At this time, growth-inducing impacts on resources are described only broadly. Growth-inducing impacts will be analyzed in greater detail in future project-specific NEPA/CEQA documents that are tiered from this document.

For this document, it was assumed that any increased water supplies or improved water supply reliability associated with the Program would stimulate growth and remove barriers to growth in the water service area.

Attachment 4

7.4 Urban Land Use

7.4.1 SUMMARY

Population growth in California creates demand for land resources for residential, commercial, and infrastructure uses, which are collectively referred to as urban uses in this section. As population grows, urbanization has the potential to convert substantial amounts of land from agriculture, wetland, open space, and other land use categories to urban uses. CALFED Bay-Delta Program (Program) actions could cause direct and indirect beneficial and adverse impacts on urban land use.

Population growth in California creates demand for land resources for residential, commercial, and infrastructure uses, which are collectively referred to as urban uses in this section.

Preferred Program Alternative. Under the Preferred Program Alternative, Urban land uses would benefit from increased flood protection associated with the Ecosystem Restoration, Levee System Integrity, and Storage Programs. Overall, the Program would provide greater flood protection for urban centers than under the No Action Alternative.

Displacement of individuals and utility infrastructure or disruption of established communities could result from Ecosystem Restoration, Levee System Integrity, Storage, and Conveyance Element actions. Water transfers to urban areas, improvements in water quality, and increased reliability of supplies could induce growth in urban areas that currently lack the water supplies to support such growth. Specific locations for habitat development and storage and conveyance structures could be inconsistent with localized general plan land use designations or zoning. Mitigation strategies have been developed which, when implemented, are expected to reduce all potentially significant adverse impacts on urban land uses to less-than-significant levels.

Alternatives 1, 2, and 3. Generally, beneficial and adverse impacts associated with the Program alternatives would be the same as those described for the Preferred Program Alternative. Impacts would differ depending on the magnitude and type of conveyance facilities that are constructed. Under Alternative 3, construction of an isolated conveyance facility primarily would affect agricultural land uses. Constructing the isolated facility could significantly affect urban land uses by displacing residents or conflicting with general plans and zoning; however, these potentially significant impacts can be mitigated to less-than-significant levels.

The following table presents the potentially significant adverse impacts and mitigation strategies associated with the Preferred Program Alternative. Mitigation strategies that correlate to each listed impact are noted in parentheses after the impact.



7.4.5 SIGNIFICANCE CRITERIA

Impacts on urban land use are considered potentially significant if implementation of a Program action would:

- Displace residents.
- Displace current urban land uses.
- Conflict with applicable environmental plans or policies of federal, state, or regional agencies with jurisdiction over land use.
- Conflict with city or county general plan designations or zoning.
- Disrupt or divide the physical arrangement of an established community.

7.4.6 NO ACTION ALTERNATIVE

Under the No Action Alternative, urban development trends in California would continue, as population levels are projected to increase. Acres would continue to move from other categories to the urban land use category. Projects listed in Attachment A for the No Action Alternative generally would not generate new urban lands, as the projects primarily would be implemented on agricultural lands, wetlands, or land use categories other than urban. Projects planned under the No Action Alternative are expected to result in an improvement in water supply reliability for urban communities.

Under the No Action Alternative, urban development trends in California would continue, as population levels are projected to increase.

7.4.7 CONSEQUENCES: PROGRAM ELEMENTS COMMON TO ALL ALTERNATIVES

For urban land use, the environmental consequences of the Ecosystem Restoration, Water Quality, Levee System Integrity, Water Use Efficiency, Water Transfer, and Watershed Programs, and the Storage element are similar under all Program alternatives, as described below. The environmental consequences of the Conveyance element vary among Program alternatives, as described in Section 7.4.8.

